# IPOS Resource Survey CFCM Considerations





# Context

### Case Management Defined

42 CFR 440.169(d)(1) 42 CFR 440.169(d)(2) 42 CFR 440.169(d)(3) 42 CFR 440.169(d)(4)

Assessment

IPOS Development IPOS Implementation and Monitoring

Referral to Services





#### Firewalls

42 CFR 441.301(c)(1)(vi)

IPOS Development IPOS Implementation and Monitoring

Direct Service Delivery

Firewall

Organization A

Organization B, etc.



Difference in Financial Interest



## Safeguard

42 CFR 441.301(c)(1)(vi)

IPOS Implementation and Monitoring

Development

IPOS Implementation Delivery



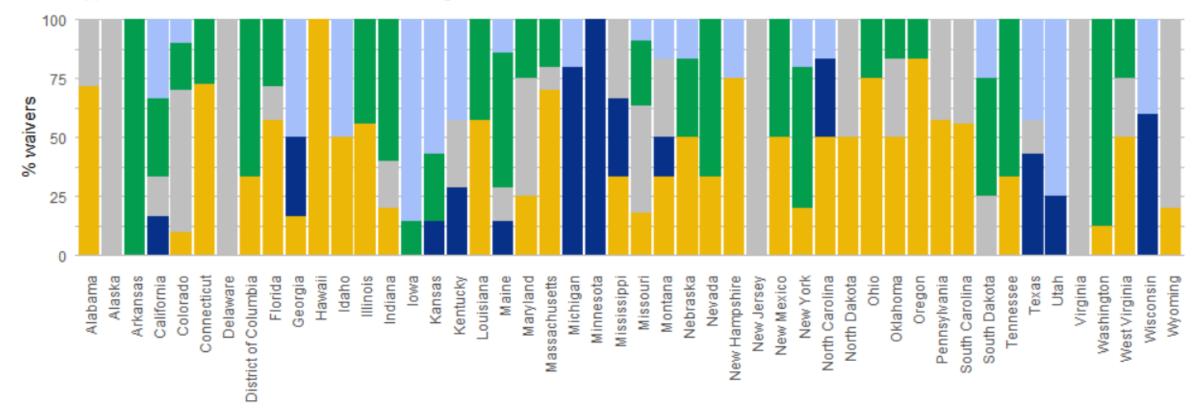
Organization A

Single Financial Interest



#### Varied Approaches Within States

Which approaches\* are waivers within each state using?







# Safeguard Implementation

IPOS Resource Survey Summary

### Safeguards

Case Manager/
Supports
Coordinator

Independent Advocate

Supports Broker

Independent Facilitation





#### Resources

Case Manager/
Supports
Coordinator

Independent Advocate

Supports Broker

Independent Facilitation





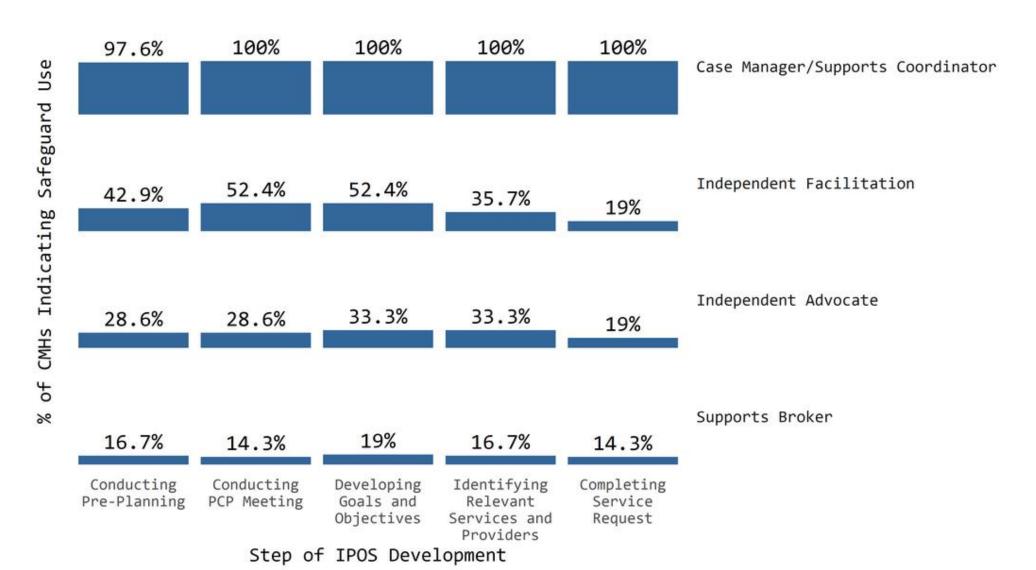
#### IPOS Resource Survey

At what points in the process do CMHs use resources?

What is the combined use of safeguards in the process?

How often do CMHs report using resources?

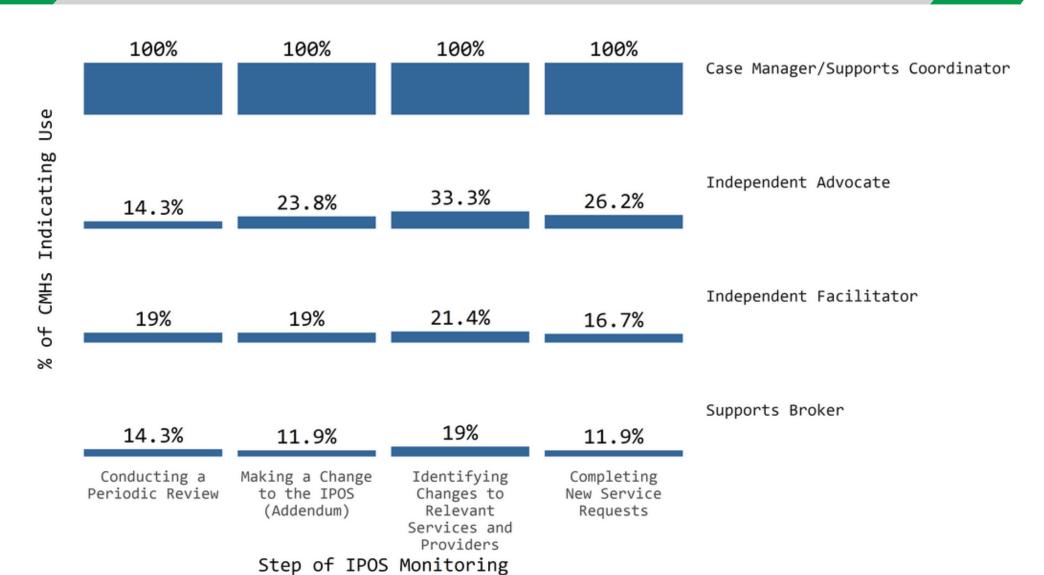
## At what points in the IPOS Development process do CMHs use resources?







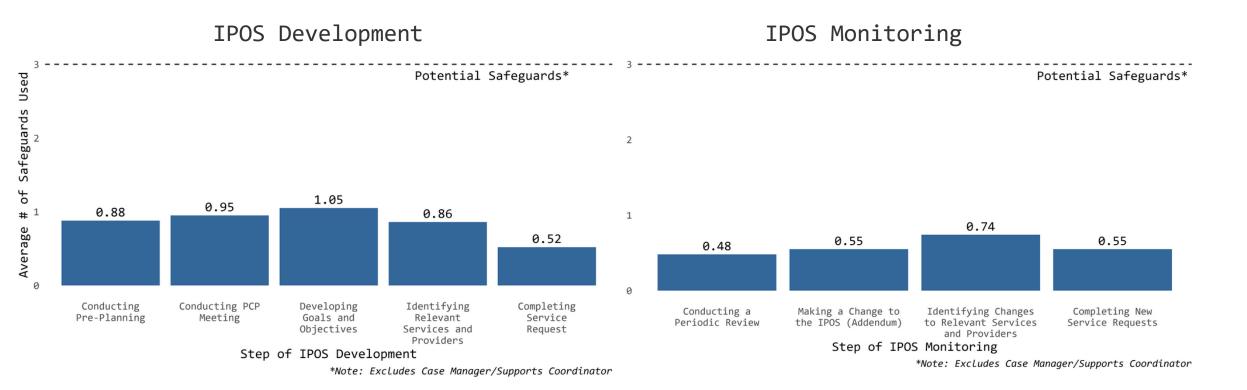
### At what points in the IPOS Monitoring process do CMHs use resources?







# What is the combined use of safeguards in the process?







# How often do CMHs use resources?

Rarely

Often

Always

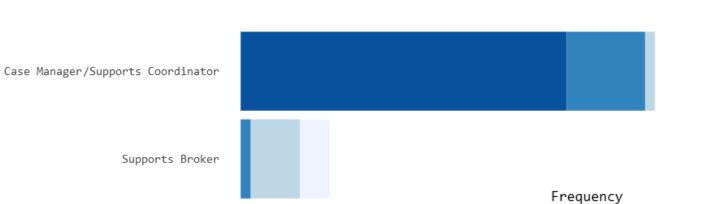
30

Occasionally

Frequently

40



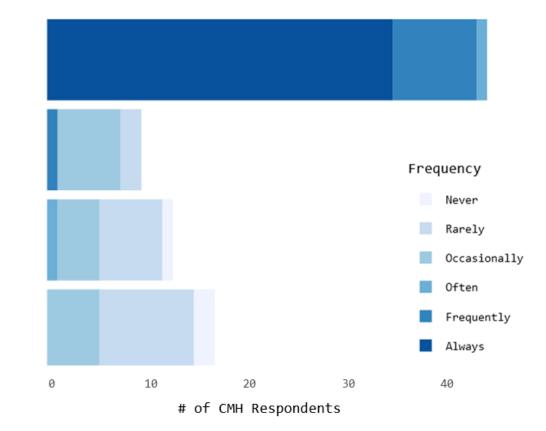




Independent Facilitation



IPOS Monitoring







#### Summary of Findings

Safeguards were used at a low frequency.

Steps that involved collaboration with the person had more conflict mitigation than administrative steps.

Safeguards were used less during IPOS Monitoring activities.

All respondents had at least one step which was not protected from conflict of interest.

#### Next Steps

#### Convene a working subcommittee

 MDHHS wants the workgroup to be diverse and reflective of primary and secondary stakeholders along with members representing the QIC and DDPIT.

Consider how to use this data to inform IPOS related performance improvement activities.